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## BEFORE THE ARIZONA CORPORATION COMMISSION

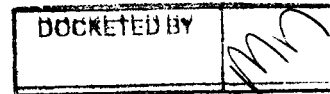
Arizona Corporation Commission

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COMMISSIONERS

KRISTIN K. MAYES—Chairman  
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IN THE MATTER OF THE APPLICATION  
 OF SULPHUR SPRINGS VALLEY  
 ELECTRIC COOPERATIVE, INC. FOR AN  
 ORDER INSTITUTING A MORATORIUM  
 ON NEW CONNECTIONS TO THE V-7  
 FEEDER LINE SERVING THE  
 WHETSTONE, RAIN VALLEY, ELGIN,  
 CANELO, SONOITA, AND PATAGONIA,  
 ARIZONA AREAS.

DOCKET NO. E-01575A-09-0453

**SULPHUR SPRINGS VALLEY  
 ELECTRIC COOPERATIVE,  
 INC.'S OBJECTIONS TO  
 INTERVENOR'S NOVEMBER 1,  
 2009 DATA REQUESTS**

Snell &amp; Wilmer

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On November 4, 2009, counsel for Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC or "Cooperative") received data requests dated November 1, 2009, propounded by Intervenor Susan J. Downing in the above-captioned matter. On November 6, 2009, SSVEC filed a Motion for a Protective Order on the basis that SSVEC should not be required to respond to the data requests until the procedural posture of this matter had been determined. SSVEC also indicated that many of the data requests that had been propounded were objectionable. On November 12, 2009, the Administrative Law Judge issued a Procedural Order requiring the Cooperative to file any objections to the data requests by November 20, 2009. Set forth below are SSVEC's objections to the data requests.<sup>1</sup>

**DR 1-1 Please provide five years of monthly load data, segregated by phases (A, B, and C) for the V-7 feeder, from 1 October 2004 through 1 October 2009. (MS Excel format acceptable).**

<sup>1</sup> Only those data requests that SSVEC has determined are objectionable are set forth herein.

1 SSVEC objects on the grounds that the request is ambiguous, vague, and is  
2 potentially overly burdensome. For example, the type of load and interval for the  
3 "monthly load data" has not been specified. Assuming the information was requested in  
4 Amps on an hourly basis, it would require the Cooperative to present a data set reflecting  
5 approximately 131,400 records to comply with the request which would be overly  
6 burdensome for SSVEC to compile and produce.

7  
8 **DR 1-3 Based on utility bills or other sources of data, please provide the kWh**  
9 **usage data by rate category for each physical zip code. Provide**  
10 **monthly data for five years from 1 October 2004 through 1 October**  
11 **2009.**

12 SSVEC objects on the grounds that this request is overly burdensome. SSVEC does  
13 not keep this information in the form requested and would have to manually retrieve and  
14 install this archived data and then process approximately 3 million billing records in  
15 order to provide the requested information.

16 **DR 1-4 Customer meter data.**

17 **d. For each total number of active meters in a., b., and c., provide**  
18 **how many of those are known to service water wells.**

19 SSVEC objects on the grounds that the requested information is not available.  
20 SSVEC does not segregate water wells from other General Service meters. SSVEC also  
21 objects on the basis of relevance.

22 **DR 1-5 Huachuca West Substation.**

23 **a. Provide the original operational date for the Huachuca West**  
24 **Substation.**

25 SSVEC objects on the grounds of relevance. The date the Huachuca West  
26 Substation was constructed has no applicability to the Application for a Moratorium.

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- 1                   **b. Provide a list of all major components of the Huachuca West**  
2                   **Substation to include serial numbers, specifications, and**  
3                   **manufacturer dates.**

4                   *SSVEC objects on the grounds of relevance. The requested information has no*  
5                   *applicability to the Application for a Moratorium.*

- 6                   **c. Provide a list of all major improvements to the Huachuca West**  
7                   **Substation to include type of improvements, dates, and cost.**

8                   *SSVEC objects on the grounds of relevance. The requested information has no*  
9                   *applicability to the Application for a Moratorium.*

- 10                  **d. Provide manufacturers design capabilities of all major**  
11                  **equipment in the Huachuca West Substation.**

12                  *SSVEC will provide the requested information for transformer, recloser,*  
13                  *regulators, distribution bus and 69kV fuse. To the extent the request seeks information on*  
14                  *equipment in addition to the above, SSVEC objects on the grounds of relevancy and would*  
15                  *be burdensome to the Cooperative.*

- 16                  **g. Has any of this equipment exceeded its operational lifecycle?**

17                  *SSVEC objects on the grounds that the question is vague and ambiguous without a*  
18                  *definition of "operational lifecycle". SSVEC further objects on the basis that the request*  
19                  *is overly broad.*

20                  **DR 1-6           Huachuca East Substation.**

- 21                  **a. Provide original operational date of Huachuca East Substation.**  
22                  **b. Provide list of all major components of the Huachuca East**  
23                  **Substation to include serial numbers, specifications, and**  
24                  **manufacture dates.**  
25                  **c. Provide list of all major improvements to the Huachuca East**  
26                  **Substation to include type of improvements, dates, and cost.**  
                    **d. Provide manufacturers design capabilities of all the major**  
                    **equipment in the Huachuca East Substation.**  
                    **e. Provide conductor capacity segregated by phases (A, C, and B)**  
                    **after the two feeders leave the Huachuca East Substation by**  
                    **distribution feeder.**

- f. Provide a detailed map of the area served by the Huachuca East Substation showing the two different distribution feeders.
- g. Provide all rational for all expansions at the Huachuca East Substation.

*SSVEC objects on the grounds of relevance. The Huachuca East Substation operates at a completely different voltage from the Huachuca West Substation and there has no applicability to the relief requested in the Application for a Moratorium.*

**DR 1-7 V-7 Feeder Data for the Area from Huachuca Substation to the Proposed Substation in Sonoita at the Intersection of State Highway 83 and Papago Springs Road.**

- b. Provide locations of public and private lands the feeder crosses.

*SSVEC objects on the grounds of relevance as the requested information has no applicability to the relief requested in the Application for a Moratorium. SSVEC further objects on the grounds that the requested information is not readily available in the form requested and the information would be available to the Intervenor through other sources available to the public.*

- c. Provide locations of all prescriptive easements.

*SSVEC objects on the grounds of relevance as the requested information has no applicability to the relief requested in the Application for a Moratorium. SSVEC further objects on the grounds that the requested information is not readily available in the form requested and the information would be available to the Intervenor through other sources available to the public.*

- d. Provide locations of all written easements.

*SSVEC objects on the grounds of relevance as the requested information has no applicability to the relief requested in the Application for a Moratorium. SSVEC further objects on the grounds that the requested information is not readily available in the form requested and the information would be available to the Intervenor through other sources available to the public.*

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**DR 1-8 Provide a list of all pending electric applications that the moratorium would impact including demand requirements for each.**

*SSVEC objects to the request to the extent the request is asking for specific customer information which SSVEC considers to be confidential. SSVEC is, however, willing to provide a summary of the number of services requests and the total associated service Ampacity to date that the moratorium would impact.*

**DR 1-9 Inquiries made by developers, corporations, ranches, government agencies, mining, and development companies.**

- a. Provide a detailed list of any and all prospective customers that have made written or verbal inquiries requesting electric service in SSVEC's service area west of Arizona State Route 90 for any time in the future, which have been received in the past 10 years. This list needs to include location, type or size of service, and anticipated start-up dates.
- b. Please provide a list of any of those in a. above that have declined to develop in the V-7 feeder area because of issues concerning electricity.
- c. For that in b. above, please provide a copy of all documentation between SSVEC and any potential customers that concerns electrical issues in the V-7 feeder area.
- d. Provide detailed list of all prospective customers as of October 1, 2009, that have executed contracts for electrical service in SSVEC's service area west of Arizona State Route 90 in the past ten years that have not yet received an energized service.

*SSVEC objects on the grounds that the requested information is: (1) not relevant or applicable to the relief requested in the Application for a Moratorium; (2) confidential; (3) vague and ambiguous; (4) overly burdensome to produce; and/or (5) not known to the Cooperative.*

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**DR 1-10 Peak Data for the V-7.**

- c. Is this criteria in b. adopted from documented manufacturer technical information and/or SSVEC practices or policies? If so, provide a copy of the relevant part of this document. If your answer is yes, identify the source and any modifications if made thereto. If your answer is no, describe who then drafted the criteria and upon what that was based.

*SSVEC objects on the grounds that the request is overly burdensome. SSVEC further objects on the basis that the requested information is not relevant to the relief requested in the Application for a Moratorium.*

- e. Describe the technical modifications that have been made to the substation equipment, feeder distribution line and/or support equipment to specifically address this issue.

*SSVEC objects on the grounds that the request is overly burdensome. SSVEC further objects on the grounds that the requested information is not relevant to the relief requested in the Application for a Moratorium.*

**DR 1-11 Provide detailed list of all outages or “brown outs” from October 1, 2004, through October 1, 2009, which have occurred on the V-7 feeder. Detailed description of each occurrence needs to include the following:**

- a. Physical location of problem.

*SSVEC can provide location numbers that correspond with the physical locations for outages. To the extent that is not acceptable, SSVEC objects on the grounds that the requested information would be overly burdensome to compile and produce. Additionally, SSVEC does not maintain records associated with ‘brownouts’ and therefore objects on the grounds that the requested information is not available.*

- b. Copies of crew logs responding to outage.

*SSVEC objects on the grounds that the requested information is not relevant to the relief requested in the Application for a Moratorium. SSVEC further objects on the grounds that it does not keep “crew logs” per se and the requested information would be overly burdensome to compile and produce.*

1 RESPECTFULLY SUBMITTED this 20th day of November, 2009.

2 SNELL & WILMER L.L.P.

3  
4 By



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10 ORIGINAL and 13 copies filed this  
11 20th day of November, 2009, with:

12 Docket Control  
ARIZONA CORPORATION COMMISSION  
13 1200 West Washington  
Phoenix, Arizona 85007

14 COPIES of the foregoing hand-delivered  
15 this 20th day of November, 2009, to:

16 Steve Olea, Director  
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17 1200 West Washington Street  
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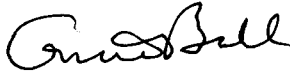
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23 this 20th day of November, 2009, to:

24 Jane Rodda, Administrative Law Judge  
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26 Tucson, Arizona 85701-1347

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